

## **EXHIBIT B**

### **State Court Notice of Filing Notice of Removal**

STATE OF SOUTH CAROLINA ) IN THE COURT OF COMMON PLEAS  
 )  
 COUNTY OF EDGEFIELD ) C/A NO.: 2023-CP-1900010

TITAN FARMS, LLC, CARR FARMS, INC., )  
 TITAN PEACH FARMS, INC., CHALMERS )  
 CARR and LORI ANNE CARR, )  
 )  
 Plaintiffs, ) **DEFENDANT’S NOTICE OF FILING NOTICE**  
 ) **OF REMOVAL IN FEDERAL COURT**  
 v. )  
 )  
 PGIM REAL ESTATE FINANCE, LLC )  
 )  
 Defendant. )  
 \_\_\_\_\_ )

PLEASE TAKE NOTICE that as of February 10, 2023, Defendant PGIM Real Estate Finance LLC (“PGIM”) has removed the above-captioned action to the United States District Court for the District of South Carolina, Greenwood Division, pursuant to 28 U.S.C. §§ 1332, 1441, and 1446. A copy of the *Notice of Removal* as filed with the U.S. District Court is attached hereto as “**Exhibit A.**” Unless remanded by the U.S. District Court, this Court’s jurisdiction over the instant litigation has terminated and no further proceedings shall follow.

Respectfully submitted this 10th day of February 2023.

s/Wade S. Kolb, III

Wade S. Kolb, III (SC Bar No. 100379)  
 WYCHE, P.A.  
 P.O. Box 728  
 Greenville, SC 29602-0728  
 Phone: 864-242-8200  
 Facsimile: 864-235-8900  
 Email: wkolb@wyche.com

*Counsel for PGIM Real Estate Finance LLC*